

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

FRANITZA FAMILY LIMITED PARTNERSHIP,
MANFRED FRANITZA REVOCABLE TRUST,
MANFRED FRANITZA, individually and in his
capacities as General Partner of the Franitza Family
Limited Partnership and as Trustee and/or
Beneficiary of the Manfred Franitza Revocable
Trust, Margrit Franitza, individually and in her
capacities as General Partner of the Franitza Family
Limited Partnership and as Trustee and/or
Beneficiary of the Manfred Franitza Revocable
Trust, URTE FRANITZA-GOLDSTEIN,
individually and as General Partner of the Franitza
Family Limited Partnership, and KAREN
FENNER, individually and a General Partner of the
Franitza Family Limited Partnership,

Defendants.

Adv. Pro. No. 10-04476 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including October 23, 2014.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

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Dated: October 1, 2014
New York, New York

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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

Dated: October 1, 2014
New York, NY

By: /s/ Jeffrey L. Bernfeld
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Manfred Franitza, individually and in his capacities
as General Partner of the Franitza Family Limited
Partnership and as Trustee and/or Beneficiary of
the Manfred Franitza Revocable Trust, Margrit
Franitza, individually and in her capacities as
General Partner of the Franitza Family Limited
Partnership and as Trustee and/or Beneficiary of
the Manfred Franitza Revocable Trust, Urte
Franitza-Goldstein, individually and as General
Partner of the Franitza Family Limited Partnership,
and Karen Fenner, individually and a General
Partner of the Franitza Family Limited Partnership*